

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JENNIFER MAZZARELLO, *
Plaintiff, *

v. *

Civil Action No. AMD 02 CV 3576
LUCENT TECHNOLOGIES INC., *

Defendant. *

* * * * *

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Defendant Lucent Technologies Inc. ("Defendant"), through undersigned counsel and pursuant to Rule 56 of the Federal Rules of Civil Procedure, respectfully moves this Court for an Order granting summary judgment in favor of Defendant and against Plaintiff. The grounds for this motion are fully set forth in the accompanying Memorandum of Points and Authorities in Support hereof with accompanying exhibits, incorporated herein by reference, and the Court's attention is also respectfully directed to Defendant's proposed Order attached hereto.

WHEREFORE, Defendant respectfully requests that its Motion for Summary Judgment be granted in its entirety; that summary judgment be granted in favor of Defendant and against Plaintiff as to each and every claim in the Complaint; that Defendant be awarded its costs in this action, including reasonable attorney fees; and that the Court grant Defendant such other and further relief as it may deem just and appropriate.

Respectfully submitted,

/s/
Robert R. Niccolini
McGuireWoods LLP
7 Saint Paul Street, Suite 1000
Baltimore, MD 21202
410-659-4400

Attorney for Defendant
Lucent Technologies Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of April, 2003, copies of Defendant's Motion for Summary Judgment, the Memorandum of Points and Authorities in Support of its Motion for Summary Judgment, and the proposed Order, which were electronically filed in this case on April 24, 2003, were mailed, first-class, postage prepaid to Paul V. Bennett, Esquire, counsel for Plaintiff, 133 Defense Highway, Suite 209, Annapolis, Maryland 21401.

/s/
Robert R. Niccolini